

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANGELO LOPES

Plaintiff,

-against-

Case No.:
20-CV-00314

JLM DECORATING NYC INC., COSMOPOLITAN
INTERIOR NY CORPORATION, JLM
DECORATING, INC., CITY VIEW BLINDS OF N.Y.
INC., MOSHE GOLD, JOEL GOLD a/k/a SAM
GOLD a/k/a SHIMMY GOLD, and MARITZA
RODRIGUEZ a/k/a MARITZA SIME

Defendants.
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**DECLARATION OF BRETT W.
JOSEPH IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Brett W. Joseph, an attorney duly admitted to this Court, hereby declare under penalty of perjury as follows:

1. I am an Associate with the firm Milman Labuda Law Group, PLLC, attorneys of record for Defendants in this action.

2. I submit this Declaration in support of Defendants' Motion for Summary Judgment.

3. A true and correct copy of the Complaint filed in this matter is attached hereto as **Exhibit "A"**.

4. A true and complete copy of the transcript of the deposition of Plaintiff Angelo Lopes' deposition taken on March 5, 2021 is annexed hereto as **Exhibit "B"**.

5. A true and complete copy of the transcript of the deposition of Defendant Moshe Gold's deposition taken on February 11, 2021 is annexed hereto as **Exhibit "C"**.

6. A true and complete copy of the transcript of the deposition of Defendant Sam Gold's deposition taken on February 11, 2021 is annexed hereto as **Exhibit "D"**.

7. A true and correct copy of the May 28, 2019 Warning Letter issued to Plaintiff by Defendants is annexed hereto as **Exhibit “E”**.

8. A true and correct copy of the termination letter issued to Plaintiff by Defendants is annexed hereto as **Exhibit “F”**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 30, 2021
Lake Success, New York

/s/ Brett W. Joseph
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